REMARKS

Claims 1, 3-10, and 16-29 are in the application, with Claims 7 through 9 and 16 through 26 having been withdrawn from further consideration. Claims 1, 3 through 6, 10 and 27 through 29 are therefore currently under consideration, with Claims 1 and 27 being the independent claims herein. No new matter has been added. Reconsideration and further examination are respectfully requested.

Applicants gratefully acknowledge the indication of allowable subject matter with respect to Claims 5, 6, 10 and 15. Applicants reserve the right to incorporate this subject matter into one or more independent claims at a later date.

Claims 1, 4, and 27-29 are rejected under 35 U.S.C. 102(b) as allegedly anticipated by U.S. Patent No. 6,081,305 (Sato); Claims 11-12, and 30 are rejected under 35 U.S.C. 102(e) as allegedly anticipated by U.S. Patent No. 6,590,346 (Hadley); Claim 3 is rejected under 35 U.S.C. 103(a) over Sato in combination with U.S. Patent No. 6,975,512 (Ooi); and Claims 13 and 14 are rejected under 35 U.S.C. 103(a) over by Hadley in combination with U.S. Patent No. 6,639,714 (Smith). Reconsideration and withdrawal of the rejections are respectfully requested.

Claim 1

Independent Claim 1, as previously described, relates to a device including a semiconductor substrate, a pixel cell array integrated with the semiconductor substrate, a liquid crystal layer in contact with the pixel cell array, a substantially transparent protective cover coupled to the liquid crystal layer, and a base coupled to the semiconductor substrate. Thermal expansion characteristics of the base are substantially similar to thermal expansion characteristics of the protective cover. As described at page 5, lines 14-20 of the present specification, some embodiments may provide increased mechanical isolation between a pixelated liquid crystal-based display and a carrier for carrying the display.

The newly-cited art of record is not seen to disclose or to suggest the foregoing features of amended Claim 1. For example, the art of record does not disclose or suggest at least the claimed substrate, pixel cell array, liquid crystal layer, protective cover, and base, wherein

thermal expansion characteristics of the base are substantially similar to thermal expansion characteristics of the protective cover.

FIG. 17 of Sato illustrates a system including glass substrate 300, liquid crystal 200, semiconductor substrate 100 and <u>ceramic</u> substrate 500. The Office Action alleges that the ceramic substrate 500 anticipates the claimed base of Claim 1. However, nowhere does Sato disclose that thermal expansion characteristics of substrate 500 are substantially similar to thermal expansion characteristics of glass substrate 300.

The Office Action appears to allege that ceramic substrate 500 and glass substrate 300 exhibit substantially similar thermal expansion characteristics merely because a ceramic material may have thermal expansion characteristics similar to a glass material. Applicants submit that such reasoning cannot be used to support a rejection, and particularly a rejection under §102. In this regard, M.P.E.P. §2131 requires that a reference used in a §102 rejection must disclose each specific element of the rejected claim, and Sato clearly does not disclose that ceramic substrate 500 and glass substrate 300 exhibit substantially similar thermal expansion characteristics.

Moreover, the prior art provides no suggestion or motivation to modify Sato so that ceramic substrate 500 and glass substrate 300 exhibit substantially similar thermal expansion characteristics. M.P.E.P. §2143.01 plainly states "[t]he mere fact that references <u>can</u> be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination.

In the rejection of Claim 3, the Office Action cites column 3, lines 29-34 of Ooi as indicating "glass or ceramic form equivalent structures known in the art", and therefore "one of ordinary skill in the art would have found it obvious to substitute glass for ceramic to form a base/substrate". Applicants note that the cited portion of Ooi indicates that BGA substrate 102 may be composed of "fiberglass, PTFE, BT resin, epoxy laminates or ceramic-plastic composites". This portion cannot stand for a universally-applicable principle such as "glass or ceramic form equivalent structures", and therefore cannot be permissibly used as a suggestion or motivation to change ceramic base 500 of Sato to a glass material. Moreover, even if such a change was obvious, the prior art would still fail to disclose or suggest changing ceramic base

500 of Sato to a material having thermal expansion characteristics that are substantially similar to those of glass substrate 300.

Accordingly, none of the art of record is seen to disclose or suggest at least the claimed substrate, pixel cell array, liquid crystal layer, protective cover, and base of Claim 1, wherein thermal expansion characteristics of the base are substantially similar to thermal expansion characteristics of the protective cover. Amended independent Claim 1 and its dependent claims are therefore believed to be in condition for allowance.

Claim 27

Independent Claim 27 relates to a system including an Ultra High Pressure light source to emit light, a condenser lens to condense the light, a display device to receive the condensed light and to emit image light, and a projector lens to project the image light. The display device includes a semiconductor substrate, a pixel cell array integrated with the semiconductor substrate, a liquid crystal layer in contact with the pixel cell array, a substantially transparent protective cover coupled to the liquid crystal layer, and a base coupled to the semiconductor substrate, thermal expansion characteristics of the base being substantially similar to thermal expansion characteristics of the protective cover.

The art of record is not seen to disclose or to suggest at least the foregoing substrate, pixel cell array, liquid crystal layer, protective cover, and base, wherein thermal expansion characteristics of the base are substantially similar to thermal expansion characteristics of the protective cover. In this regard, nowhere does Sato or any other prior art disclose or suggest modifying ceramic substrate 500 to exhibit thermal expansion characteristics that are substantially similar to thermal expansion characteristics of glass substrate 300. Amended independent Claim 27 and its associated dependent claims are therefore believed to be in condition for allowance.

CONCLUSION

Accordingly, Applicants respectfully request allowance of the pending claims. If any issues remain, or if the Examiner has any further suggestions for expediting allowance of the present application, the Examiner is kindly invited to contact the undersigned via telephone at (203) 972-0049.

Respectfully submitted,

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